

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts  
Southern District of Texas  
FILED

September 06, 2019

David J. Bradley, Clerk of Court

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)Priority Mail Parcel 9470103699300045853932 ,  
addressed to "Blaney Becky, 2422 Clear Ridge Dr.  
Kingwood, TX 77339-4611"Case No. **4:19mj1695**

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):  
Priority Mail Parcel 9470103699300045853932 , addressed to "Blaney Becky, 2422 Clear Ridge Dr. Kingwood, TX 77339-4611", currently located in the USPS Houston Division Headquarters office.

located in the Southern District of Texas , there is now concealed (identify the person or describe the property to be seized):  
controlled and/or prescription substances

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 USC 331(a)	Introduction into Interstate Commerce of a Misbranded Drug
21 USC 846	Conspiracy

The application is based on these facts:  
see attached affidavit

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_ ) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Joseph S. MacDougall, Postal Inspector

Printed name and title

Sworn to before me by telephone.

Date: September 06, 2019City and state: Houston, TX

Judge's signature

Dena H. Palermo, US Magistrate Judge

Printed name and title

**ATTACHMENT A**

**PARCELS TO BE SEARCHED**

**Ten Mail Parcels located at the U.S. Postal Inspection Service (USPIS) Houston Office at 4600 Aldine Bender Rd #400, Houston, TX 77315 and further described as follows:**

Subject Parcel 1:	Priority Mail Parcel 9470136897846012632547
Addressee:	Gloria Garrido 1211 San Drift PT San Diego, CA 92154-8479
Sender:	Jenny's Fancy Collection 1114 Maclesby LN. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope
Subject Parcel 2:	Priority Mail Parcel 9470136897846012632257
Addressee:	Renee Dubose 1070 Bradshaw Estates Dr. Canton, GA 30115-6561
Sender:	Jenny's Fancy Collection 1114 Maclesby Ln. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope
Subject Parcel 3:	Priority Mail Parcel 9470136897846012632356
Addressee:	Steven Knapp 21 Rolling Green Ln. Wrappingers Falls, NY 12590-6436
Sender:	Jenny's Fancy Collection 1114 Maclesby LN. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope

Subject Parcel 4:	Priority Mail Parcel 9470136897846012631809
Addressee:	Nix Tiana 2318 NW 26 <sup>th</sup> St. Oklahoma City, OK 73107-2512
Sender:	Jenny's Fancy Collection 1114 Maclesby LN. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope
Subject Parcel 5:	Priority Mail Parcel 9470136897846012632059
Addressee:	Ron Shores Mattress Firm 804 E El Camino real Mountain View, CA 94040-2808
Sender:	Jenny's Fancy Collection 1114 Maclesby LN. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope
Subject Parcel 6:	Priority Mail Parcel 9470136897846012632431
Addressee:	Reyes Erick 8445 La Vela Ave Whittier, CA 90605-1140
Sender:	Jenny's Fancy Collection 1114 Maclesby LN. Channelview, TX 77530-2425
Size/Dimensions:	Purple plastic mailer Approximately 9" x 6"
Postmarked:	09/04/2019
Postage Amount:	Easypost Flat Rate Envelope
Subject Parcel 7:	Priority Mail Parcel 9470103699300045853949
Addressee:	Juliet Garruto 122 Arrowhead Dir Jupiter FL 33458-7354
Sender:	J&F Design 794 Normandy St. Houston, TX 77015-3659
Size/Dimensions:	gray plastic mailer Approximately 12" x 6"
Postmarked:	09/04/2019

Subject Parcel 8: Priority Mail Parcel 9470103699300045853932  
Addressee: Blaney Becky  
2422 Clear Ridge Dr.  
Kingwood TX 77339-4611  
Sender: J&F Design  
794 Normandy St.  
Houston, TX 77015-3659  
Size/Dimensions: gray plastic mailer  
Approximately 12" x 6"  
Postmarked: 09/04/2019  
Postage Amount: \$25.50

Subject Parcel 9: Priority Mail Parcel 9470103699300045853925  
Addressee: Reath Denae  
16 Sunnyside Ct.  
Orinda, CA 94563-1115  
Sender: J&F Design  
794 Normandy St.  
Houston, TX 77015-3659  
Size/Dimensions: gray plastic mailer  
Approximately 12" x 6"  
Postmarked: 09/04/2019  
Postage Amount: \$25.50

Subject Parcel 10: Express Mail Parcel EJ019568840US  
Addressee: Termeer Kelly  
4650 Old Princess Anne Rd.  
Virginia Beach, VA 23462  
Sender: Amanda Castro  
555 Normandy St. Apt. 1401  
Houston, TX 77015  
Size/Dimensions: Express Mail Flat Envelope  
Approximately 12.5" x 9.5"  
Postmarked: 09/04/2019  
Postage Amount: \$25.50

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In the Matter of the Search of	§	
	§	Magistrate No.
	§	
United States Postal Service	§	
(10) Priority Mail Parcel numbers	§	
9470136897846012632547	§	
9470136897846012632257	§	
9470136897846012632356	§	
9470136897846012631809	§	
9470136897846012632059	§	
9470136897846012632431	§	
9470103699300045853949	§	
9470103699300045853932	§	
9470103699300045853925		
EJ019568840US		

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Joseph MacDougall, being duly sworn, state the following:

1. I have been employed by the United States Postal Inspection Service for the past seven (7) years. During my career as a federal law enforcement officer, I have worked drug trafficking investigations and participated in hundreds of controlled substance investigations involving the transportation of controlled substances or proceeds/payments through parcel delivery services, to include the United States Mails, as well as private delivery couriers such as United Parcel Service (UPS) and Federal Express (FedEx). During this time I have intercepted or helped in intercepting in excess of one thousand (1000) parcels which were found to have contained controlled substances or the proceeds of controlled substance sales. I have received training by the U.S. Postal Inspection Service (USPIS) in the investigation of controlled substances or the proceeds of narcotics sales being transported through parcel delivery services.

2. I also rely upon the training and experience of other members of the USPIS Houston Division Narcotics Team. The team is comprised of eight (8) members, three (3) of whom have been assigned to narcotics investigations for at least two (2) years. During that time, the USPIS



Houston Division Narcotics Team has intercepted in excess of five thousand (5,000) parcels which were found to have contained controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances.

3. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U. S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail - overnight; Priority mail - two day delivery), reliability, free telephone and Internet package tracking services, as well as the perceived minimal chance of detection. Express Mail and Priority Mail were originally intended for urgent, business to business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, has indicated that these parcels are usually addressed from an individual to an individual. Express Mail and Priority Mail are seldom used for individual to individual correspondence.

4. In an effort to combat the flow of controlled substances through the overnight delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known 'sources' of controlled substances. The USPIS conducts an ongoing analysis of prior packages mailed through overnight delivery services, which were found to contain controlled substances or proceeds/payments of controlled substance sales. The analysis of prior packages, which were found to contain controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, indicated that these parcels are usually sent from an individual to an individual. In the few cases when overnight delivery packages containing controlled substances or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances, have displayed a business or company name, it has usually proven to be fictitious or used without the owner's knowledge and consent. Additionally, this analysis has established a series of characteristics which, when found in combination of two (2) or more, have shown a high probability that the

package will contain a controlled substance or the proceeds of controlled substance sales or moneys furnished or intended to be furnished in exchange for controlled substances. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U. S. Postal Service Express Mail, Federal Express, and United Parcel Service. This profile includes, but is not limited to, the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed to or from a Commercial Mail Receiving Agency (CMRA); package is addressed from an individual to an individual; phone numbers listed on the package are not related to the listed parties or are not in service; packages are wrapped and/or heavily taped; frequency of the mailings is inconsistent with normal use absent a business relationship; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address.

5. The USPIS analysis of prior narcotics packages mailed through overnight delivery services has consistently shown that the identification of ‘source’ cities has proven to be one of several reliable characteristics used in identifying suspect parcels. This analysis has also demonstrated that narcotics parcels originating from states other than source locations have been consistently found to contain ‘designer’ drugs, such as Ecstasy, GBL, GHB, Anabolic Steroids, and other similar controlled substances. Generally such ‘designer drugs’ are not organic and are the product of a laboratory process. USPIS has identified Cocoa, FL as a source city for narcotics.

#### **PARCELS TO BE SEARCHED**

6. This affidavit is made in support of an application for a Federal search warrant to search United States Postal Service (USPS) Priority Mail Parcels 9470136897846012632547 (“Subject Parcel 1”), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632257 (Subject Parcel 2), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632356 (Subject Parcel 3), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012631809 (Subject Parcel 4), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632059 (Subject Parcel 5), and United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632431 (Subject Parcel 6) Priority Mail Parcel 9470103699300045853949 (“Subject Parcel 7”), United States Postal



Service (USPS) Priority Mail Parcel 9470103699300045853932 (Subject Parcel 9), United States Postal Service (USPS) Priority Mail Parcel 9470103699300045853925 (Subject Parcel 9) and Express Mail Parcel EJ019568840US (Subject Parcel 10), described more particularly in attachment A.

### **PROBABLE CAUSE**

7. On November 8, 2018, the postmaster in Le Roy, WV contacted Inspector Josh Mehall and reported that an address was receiving numerous parcels containing Xanax to his residence and requested law enforcement assistance. Inspector Mehall began an investigation and obtained warrants to intercept the packages.

8. Inspector Mehall obtained a federal search warrant and seized approximately 1.2 oz of white bar shaped tablets bearing no markings or impressions that are consistent with foreign manufactured Xanax tablets. Additionally, the tablets did not bear any US manufacturing impressions, and the pills were sent in a plastic “ziplock” type pill bag that is inconsistent with dispensing requirements. The package was a priority mail parcel with a US postal “Click-N-Ship” label mailed from Houston, TX in November 2018.<sup>1</sup> The package was addressed to an address occupied by Correy Raines.

9. Inspector Mehall conducted a knock and talk at the address of Correy Raines, with Virginia State police. During the knock and talk, the receiver, Corey Raines, admitted that he was ordering Xanax from a website. He stated that he was diagnosed via “telemedicine” by a doctor through iPhone “facetime”, who then prescribed him the Xanax, which is a schedule 4 controlled substance.

10. “Telemedicine” is a diagnosis by a doctor via telephonic or computer web based interaction. As there is no physical exam performed, controlled substances cannot be prescribed via telemedicine diagnosis.<sup>2</sup> Because the drugs were shipped without a valid

---

<sup>1</sup> Click-N-Ship accounts are US postal postage accounts that allow a registered user to produce and pay for postage from their residence by printing the postage off a computer in order to mail.

<sup>2</sup> Under the Controlled Substances Act, Title 21, United States Code, § 841(a), *et seq.*, and Title 21, Code of Federal Regulations, § 1306.04, a prescription for a controlled substance is not legal or effective unless it is issued for a legitimate medical purpose by a practitioner acting in the usual course of professional practice. A practitioner acting in the usual course of professional practice must conduct at least one in-person medical evaluation of the patient, which means a medical evaluation that is conducted with the patient in the physical presence of the practitioner. (Title 21, United States Code, § 829(e)(2)A)(i) & (e)(2)B)(i)



prescription, Inspector Mehall contacted Inspector MacDougall, USPIS Houston regarding the parcel.

11. Inspector MacDougall queried postal business databases and found the Click-N-Ship account used to send the parcel to Correy Raines in West Virginia, mailed over 300 parcels in the last year. Inspector MacDougall continued to monitor the Click-N-Ship account and on April 10, 2019, a parcel addressed to Alexandria, VA was referred to the USPIS office.

12. A knock and talk was conducted at the Alexandria, VA address and a consent search recovered 20 pink tablets that tested positive for Oxycodone HCL tablets.<sup>3</sup> The recipient then identified a website as the source of the pills, and again, no physical examination was required to order the pills. The website address provided was <http://www.rxmedsontime.net/>.

13. Inspector MacDougall and SA Kessler reviewed the website and found that it offered various controlled and prescription pills for sale, to include Hydrocodone, Percocet, Tramadol, Oxycodone, Soma, Xanax, and Ambien tablets. Inspector MacDougall knows, based upon his experience and training, that online pharmacies offering controlled and prescription pills for sale smuggle foreign branded non-FDA versions of the medications to introduce to interstate commerce in order to circumvent legitimate law enforcement pill diversion countermeasures.

14. Between April 2019 and June 2019, FDA SA Matt Kessler conducted 3 undercover buys from <http://www.rxmedsontime.net/> and obtained Oxycodone HCL and Xanax tablets.<sup>4</sup> SA Kessler was never required to provide evidence of a valid legal prescription or any medical diagnosis for any of the undercover (UC) buys conducted. SA Kessler ordered the first buy through the website, then he began direct email and telephone communication with the operators of the website to purchase additional orders. The first two orders were shipped using a Click-N-Ship account. The first was return addressed from "J&F Designs, 794 Normandy St. Apt 916, Houston, TX 77015". Inspector MacDougall queried various law enforcement and postal databases and found that Jorge Fuentes was associated with

---

<sup>3</sup> Oxycodone HCL is a schedule 2 controlled substance.

<sup>4</sup> Oxycodone HCL and Xanax tested positive as controlled substances by the FDA laboratory.

the address. The third buy was sent overnight shipping with a return address of Amanda Castro, 914 Main Street #1203, Houston, TX 77002”.<sup>5</sup> SA Kessler was instructed to wire money for the third UC buy to a Jennifer Barreto via her Bank of America account. A review of Barreto’s Texas driver’s license showed her to be a Hispanic female, with an address of 794 Normandy St. Apt. 916, Houston, TX 77015.

15. Inspector MacDougall found financial instruments associated with the transactions described in paragraph 14 that were linked to Click-N-Ship accounts. The transactions were at several post office “SSK” or “self-service kiosks”, which are automated postal machines in post offices that allow a customer to purchase postage with a credit card. Inspector MacDougall reviewed CCTV footage and found that two Hispanic females were seen mailing parcels and one of the two appeared to be Jennifer Barreto.

16. Inspector MacDougall and SA Kessler received a deconfliction request with on ongoing OCDETF investigation out of Miami, FL. Inspector MacDougall learned that a transnational criminal organization was operating a large scale pill diversion and smuggling operation with a source of supply located in Miami, FL. The Miami investigation identified several addresses in the Houston area receiving bulk shipments of pills, to include a seizure of bulk Oxycodone tablets totaling 472 grams that was addressed to 555 Normandy St. Apt. 1610, Houston, TX 77015. Surveillance at this residence revealed a black Jeep Cherokee with Texas tag KFX 6995, which has been identified as a vehicle operated by Jennifer Barreto and registered to Jorge Fuentes at that location.

17. On September 4, 2019, Inspector MacDougall and SA Kessler conducted surveillance at 555 Normandy St. Apt. 1610 Houston, TX 77015. Agents observed a black jeep Cherokee sport SUV, bearing TX tag KFX 6995. Both Barreto and Fuentes were linked to supplying illegal narcotics to the undercover agent as described in paragraph 14. Barreto was observed leaving the apartment in the black jeep and then driving to 794 Normandy St. Houston, TX 77015, which was the return address for the first shipment of pills by the undercover. (See paragraph 14.)

18. On September 4, 2019, Jennifer Barreto and a second female were followed to

---

<sup>5</sup> Inspector MacDougall queried various law enforcement and postal databases and found that “Amanda Castro” did not associate to that address.



the US Post Office, located at 5415 Lawndale Street, Houston, Southern District of Texas. Barreto was observed opening the rear driver's side door and retrieving a plastic bag. She entered the post office and deposited parcels from the bag into a mail slot. Inspector MacDougall retrieved nine (9) parcels from the slot.<sup>6</sup> Inspector MacDougall also observed Barreto sending an Express Mail parcel, which he retrieved (parcel number 10)<sup>7</sup>. Inspector MacDougall spoke with postal clerks at the station, who reported that Barreto mailed parcels daily at their station.

19. Inspector MacDougall examined the outside of the parcels deposited for mailing by Jennifer Barreto. Parcels one through six listed a business, "Jenny's Fancy collection" on the return. The physical return address was listed as "1114 Maclesby Ln, Channelview, TX 77530-2425", which is a residence and not a business. In addition, Inspector MacDougall could not find records on the internet or other from other sources showing a business with the name "Jenny's Fancy Collection". Inspector MacDougall has probable cause to believe that the return address is false and used to conceal the true source for the parcels.

20. Inspector MacDougall found that parcels seven (7) through nine (9) had a return address of J&F Design, 794 Normandy St. Houston, which is the same return address used for the illegal narcotics received in the undercover operation described in paragraph 14. The final parcel, number ten (10), listed Amanda Castro as the sender, which is the same name used on the return address in the third undercover buy described in paragraph 14.

---

<sup>6</sup> The numbers for the parcels are as follows: Priority Mail Parcel 9470136897846012632547 ("Subject Parcel 1"), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632257 (Subject Parcel 2), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632356 (Subject Parcel 3), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012631809 (Subject Parcel 4), United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632059 (Subject Parcel 5), and United States Postal Service (USPS) Priority Mail Parcel 9470136897846012632431 (Subject Parcel 6) Priority Mail Parcel 9470103699300045853949 ("Subject Parcel 7"), United States Postal Service (USPS) Priority Mail Parcel 9470103699300045853932 (Subject Parcel 9), United States Postal Service (USPS) Priority Mail Parcel 9470103699300045853925 (Subject Parcel 9).

<sup>7</sup> Express Mail Parcel EJ019568840US (Subject Parcel 10)



21. Based upon the foregoing facts and circumstances, Agent MacDougall can show that Jennifer Barreto is linked to the on-line sale of narcotics to an undercover officer and that she was observed depositing 10 packages into the mail on September 4, 2019. Those packages contain the same type of false return address information that was found on the packages received in the undercover operation and there is probable cause believe that the packages contain controlled substances, prescription medications, and documents linking the individuals to the on-line sales. The sale of the controlled substance(s) and prescription pills on the internet without a valid prescription constitutes violations of 21 U.S.C. §§ 331(a) and 846. Therefore, Agent MacDougal requests to search the ten (10) parcels for any such controlled substance(s) or evidence of violations of 21 U.S.C. §§ 331 (a) and 846 and to seize the same.

  
\_\_\_\_\_  
Joseph MacDougall  
United States Postal Inspector

Subscribed and sworn to before me at Houston, Texas, on this 6th day of September, 2019, and I so find probable cause.

  
\_\_\_\_\_  
Dena H. Palermo  
United States Magistrate Judge